

Honorable Thomas S. Zilly

**U.S. DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON**

STRIKE 3 HOLDINGS, LLC, a
Delaware corporation,

Plaintiff,

vs.

JOHN DOE, subscriber assigned IP
address 73.225.38.130,

Defendant.

JOHN DOE, subscriber assigned IP
address 73.225.38.130,

Counter-claimant,

vs.

STRIKE 3 HOLDINGS, LLC, a
Delaware corporation,

Counter-defendant

Case No. 2:17-cv-01731-TSZ

**DECLARATION OF J. CURTIS
EDMONDSON IN SUPPORT OF
DEFENDANT'S MOTION TO
COMPEL RESPONSES TO
DEFENDANT'S REQUEST FOR
PRODUCTION OF DOCUMENTS,
SET ONE**

**NOTING DATE:
FRIDAY, AUGUST 31, 2018**

ORAL ARGUMENT REQUESTED

DECLARATION OF J. CURTIS EDMONDSON IN
SUPPORT OF DEFENDANT'S MOTION TO COMPEL
RESPONSES TO DEFENDANT'S REQUEST FOR
PRODUCTION OF DOCUMENTS, SET ONE - 1

EDMONDSON IP LAW
Venture Commerce Center, 3699 NE John Olsen Ave.
Hillsboro, Oregon 97124
TEL. 503.336.3749 • FAX 503.482.7418

1 I, J. CURTIS EDMONDSON, declare as follows:

- 2 1. I am an attorney licensed to practice law within the States of California, Washington,
3 and the District of Columbia. I am admitted to several district and federal appellate
4 courts.
- 5 2. I am counsel of record for Defendant JOHN DOE, subscriber assigned IP address
6 73.225.38.130 ("Doe") in this matter. I have handled over 30 bittorrent cases for
7 defendants in various districts across the United States.
- 8 3. **Exhibit 1** is a true and correct copy of Doe's Request for Production of Documents, Set
9 One, served on May 31, in this matter.
- 10 4. **Exhibit 2** is a true and correct copy of the objections served by Strike 3 to Doe's
11 Request for Production of Documents, Set One.
- 12 5. **Exhibit 3** is a true and correct copy meet and confer summary letter sent on August 2,
13 2018.
- 14 6. On August 3, 2018 the parties had another telephonic meet and confer with counsel J.
15 Curtis Edmondson, Kiren Rockenstein, Bryan Case, and Lincoln Bandlow on this
16 discovery issue.
- 17 7. **Exhibit 4** is a true correct copy of a follow up email chain between counsel.
- 18 8. All of the documents requested are relevant to Plaintiff's claims and their defenses.

19 I swear under the penalty of perjury under the laws of the United States of America that the
20 above is true and correct.

21 Executed on: August 8, 2018

22 /s/ J. Curtis Edmondson

23 J. CURTIS EDMONDSON
24 Declarant

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DECLARATION OF J. CURTIS EDMONDSON IN
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RESPONSES TO DEFENDANT'S REQUEST FOR
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CERTIFICATE OF SERVICE

I, J. Curtis Edmondson, hereby certify that on August 9, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Bryan J. Case, WSBA #41781
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Attorneys for Plaintiff Strike 3 Holdings LLC

DATED this 9th day of August, 2018.

By: /s/ J. Curtis Edmondson
J. Curtis Edmondson

DECLARATION OF J. CURTIS EDMONDSON IN
SUPPORT OF DEFENDANT'S MOTION TO COMPEL
RESPONSES TO DEFENDANT'S REQUEST FOR
PRODUCTION OF DOCUMENTS, SET ONE - 3

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